

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JUL 13 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Section 73.202(b),)	MM Docket No. 98-74
Table of Allotments,)	RM-9269
FM Broadcast Stations)	
(Eatonville, Wenatchee and Moses Lake,)	
Washington))	

TO: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

JOINT COUNTERPROPOSAL
AND RESPONSE TO SHOW CAUSE ORDER

Pioneer Broadcasting Company, Inc. ("Pioneer"), Upper Columbia Media Association ("UCMA") and James and Helen Stargel ("Stargel") (hereinafter referred to as the "Joint Filers") hereby respectfully submit this Joint Counterproposal in response to the Notice of Proposed Rule Making and Order To Show Cause ("NPRM"), DA 98-957, released May 22, 1998, in the above-identified proceeding. Pioneer is the licensee of KKRv(FM), Wenatchee, Washington; and KWIQ-FM, Moses Lake, Washington. UCMA is the licensee of KEEH(FM), Spokane, Washington. Stargel is the licensee of KMJY(FM), Newport, Washington.

The Commission issued the NPRM in response to a petition for rule making filed by Barbara J. Geesman ("Geesman"), licensee of KKBY-FM, Eatonville, Washington. Geesman requested and the Commission now proposes that KKBY be upgraded from Channel 285A to

10 + 3

Channel 285C3. To accommodate this upgrade, the Commission also proposes to change the channel allotments for Wenatchee and Moses Lake and to modify the licenses for KKR V and KWIQ, respectively. Channel 262C2 would be substituted for Channel 285C2 at Wenatchee (KKRV); and Channel 285C1 would replace Channel 262C1 at Moses Lake (KWIQ). The Commission ordered Pioneer to show cause why the licenses for KKR V and KWIQ should not be so modified.

The Joint Filers counterpropose the following combination of interrelated amendments to the Table of Allotments which would result in a superior use of the FM broadcast spectrum, providing improved aural service to a greater number of communities, while also reducing or eliminating entirely certain existing short-spacing. The proposal set forth in the NPRM is mutually exclusive with this counterproposal in several respects and would effectively preclude the upgrading of three allotments. Instead of upgrading the Eatonville allotment as proposed in the NPRM, the Joint Filers propose the following allotment plan: (1) substitution of Channel 262C for Channel 262C1 at Moses Lake and the modification of KWIQ accordingly; (2) upgrading Channel 285A at Newport to Channel 283C3 and the parallel modification of KMJY; and (3) replacing Channel 284A with Channel 285C2 at Spokane and modifying KEEH in the same manner. A tabular depiction of these amendments to the Table of Allotments is as follows:

<u>Community</u>	<u>Present</u>	<u>Channel Number</u>
		<u>Proposed</u>
Moses Lake, Washington	257A, 262C1	257A, 262C
Newport, Washington	285A	283C3

Spokane, Washington

225C, 229C, 245C3
251C, 255C, 260C,
280C2, 284A, 289C
300C

225C, 229C, 245C3,
251C, 255C, 260C,
280C2, 285C2, 289C,
300C.

Submitted herewith in Attachment A in support of this Counterproposal is an Engineering Statement produced by the broadcast consulting engineering firm of Hatfield & Dawson which demonstrates that each of these proposed upgrades can be accomplished in accord with the Commission's spacing and coverage rules. The reference sites stipulated for Channel 283C3 at Newport and Channel 285C2 at Spokane are the presently licensed sites for KMJY (NL 48-09-37, WL 117-01-49) and KEEH (NL 47-34-45, WL 117-17-48), respectively. The reference site for Channel 262C at Moses Lake is NL 47-29-20, WL 119-26-45.

The Counterproposal Presents the Preferred Use of the Spectrum

The Commission's allotment priorities are set forth in Assignment Policies and Procedures, 90 F.C.C.2d 88 (1982). The four priorities are: (1) first full-time aural service; (2) second full-time aural service; (3) first local service; and (4) other public interest matters. Apparently neither the NPRM nor this Counterproposal presents any allotment proposal that would meet any of the first three priorities. Therefore, the decision must be made on the basis of other public interest matters. The Joint Filers' Counterproposal is superior to the NPRM proposal with respect to two important public interest factors: (1) it would allow the expansion of service for three stations in three communities, as compared to the single upgrade at Eatonville; and (2) it would help eliminate or reduce existing short-spacing.

The Joint Filers' plan would enable three stations to expand their service areas, as compared to the expansion of just one station in the Commission's proposal. The Commission's

policies in comparative allotment proceedings have long favored options that allow for the expansion of service of the largest number of stations. Indeed, Section 307(b) of the Communications Act of 1934 requires that approach. The Commission affirmed this in Archilla-Marcocci Spanish Radio Company, 101 F.C.C.2d 522 (Rev.Bd. 1985), rev. den., FCC 86-271 (Commission, May 30, 1986) (Section 307(b) is better served by granting proposals to serve three communities rather than one).

Adoption of the allotment plan in this Counterproposal would also help alleviate existing short-spacing, as described in the Engineering Statement. Presently, KEEH and KMJY are short-spaced by 4.37 kilometers. The proposed amendments would eliminate that condition entirely, assuming that each station remains at its present transmitter site. KEEH is currently short-spaced by 4.31 kilometers to an allotment at Cranbrook, British Columbia, Canada. That short-spacing would also be eradicated. KMJY is short-spaced to an allotment at Bonnington Falls, British Columbia by 30.67 kilometers, and to the Cranbrook allotment by 17.6 kilometers. With the channel changes proposed herein, KMJY would no longer be short-spaced to the Bonnington Falls allotment. Further, KMJY would cause no prohibited overlap on Canadian territory with the Cranbrook allotment. This arrangement would be permissible under the Working Arrangement for the Allotment and Assignment of FM Broadcasting Channels under the Agreement Between the Government of Canada and the Government of the United States of America Relating to the FM Broadcasting Service. "Elimination of . . . short-spacings . . . is indeed a public interest factor to be considered [in an allotment proceeding]." Rochester and Walton, Indiana, 8 F.C.C.Rcd. 955, at para. 15 (MMB 1993). The Commission has repeatedly reiterated the public interest value of alleviating short-spacings. See, Kewanee, Illinois, 11

F.C.C.Rcd. 2952 (MMB 1996); Cloverdale, Montgomery and Warrior, Alabama, 10 F.C.C.Rcd. 13630 (MMB 1995); Sulphur and South Fort Polk, Louisiana, 10 F.C.C.Rcd. 4952 (MMB 1995). Again, on this count, the Counterproposal presents a better option than that advanced in the NPRM.

Geesman Is Incapable of Providing Reimbursement

The proposal presented in the NPRM includes channel changes for KKRv and KWIQ in order to accommodate the upgrade of Geesman's station, KKBY. As the NPRM notes, whenever an existing licensee or permittee is ordered to change frequency to accommodate a new channel allotment, Commission policy requires the benefitting party, or parties, to reimburse the affected station for costs incurred. See, Circleville Ohio, 8 F.C.C.2d 159 (1967). NPRM at 2. Accordingly, if the Commission adopts the proposal in the NPRM, Geesman would be required to reimburse Pioneer for the costs incurred by Pioneer in implementing the channel changes for KKRv and KWIQ. Attachment B hereto is a listing of the estimated costs that Pioneer would incur in effectuating the proposed frequency switches for KKRv and KWIQ, submitted by Richard P. Kale, Pioneer's Chief Executive Officer. As that detailed summary indicates, the sum total of such expenses comes to \$283,443.00. This is a large sum of money for the small size of the market involved.

Despite Ms. Geesman's alleged willingness to provide such reimbursement, Pioneer's past experience indicates that Ms. Geesman is an unreliable source for such reimbursement. Accompanying this pleading as Attachment C is a declaration from Pioneer's corporate counsel, Thomas J. Lucas. He states that in 1991, Ms. Geesman and Bar B- Broadcasting, Inc. provided a shareholder and Vice-President of Pioneer, Matthew N. Clapp, Jr, with a promissory note dated

November 12, 1991, calling for payments of \$800.00 per month for a three year period with a balloon payment due at the end of 1994. In the process of paying that note, Ms. Geesman failed to make timely payments in December, 1992, did not make a full payment in January, 1993 or make timely payments in March, 1994 and April, 1994. Ms. Geesman then proceeded to fail to timely make her May and June, 1994 payments. Thereafter, a protracted negotiation took place with her attorney in which a compromise was worked out for timely payment, which then Ms. Geesman failed to meet.

Finally, after further negotiations and agreement, Ms. Geesman made her final payments. However, as Pioneer's corporate counsel concludes in Attachment C, Pioneer believes that Ms. Geesman's checkered payment history indicates that her finances are questionable and that the reliability of collections from her are at best uncertain.

Thus, if in anyway, the Commission entertains or grants Geesman's proposal, that Commission order should require her to escrow the \$283,443.00 of projected reimbursable expenses as a condition of her being allowed to implement the proposal. Such an escrow should be required to be set up within 14 days of the issuance of the Commission's order with a mutually agreeable escrow agent and under mutually agreeable escrow terms. In the event that Ms. Geesman does not comply with this provision, Pioneer could timely ask for reconsideration of the Commission's order, which the Commission could then grant based on Ms. Geesman's failure to meet the reimbursable expense requirement.

Statements of Expression of Interest

If the Commission allots Channel 262C to Moses Lake, Pioneer commits that it will file and fully prosecute an application to use that allotment for upgraded facilities for KWIQ.

If the Commission allots Channel 283C3 to Newport, Stargel commits that it will file and fully prosecute an application to use that allotment for upgraded facilities for KMJY.

If the Commission allots Channel 285C2 to Spokane, UCMA commits that it will file and fully prosecute an application to use that allotment for upgraded facilities for KEEH.

Submitted herewith as Attachment D is a "Declaration and Verification" executed by James and Helen Stargel. Stargel appears in this proceeding pro se. A declaration attesting to the accuracy of the facts and information asserted by Stargel is therefore required pursuant to Section 1.52 of the Commission's rules.

It is clear from the totality of the factors present in this case that this Joint Counterproposal involving the upgrade and improvement of services for three stations would better serve the public interest than the single-station proposal made in the NPRM. For the foregoing reasons, Pioneer, UCMA and Stargel respectfully urge the Commission to reject the proposed allotment of Channel 262C3 to Eatonville, Washington, and instead, to amend the FM Table of Allotments in accord with this Joint Counterproposal.

Respectfully submitted,

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July 13, 1998

Respectfully submitted,

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July 11, 1998

ATTACHMENT A

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ENGINEERING STATEMENT

COUNTERPROPOSAL

IN THE MATTER OF:

*Amendment of Section 73.202(b),
Table of Allotments, FM Broadcast Stations.
(Eatonville, Wenatchee and Moses Lake, Washington)*

*MM DOCKET NO. 98-74
RM-9269*

PIONEER BROADCASTING COMPANY, INC.,
JAMES AND HELEN STARGEL &
UPPER COLUMBIA MEDIA ASSOCIATION

7/98

ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of Pioneer Broadcasting Company, Inc., licensee of KWIQ(FM), channel 262C1, Moses Lake, Washington, James and Helen Stargel, licensee of KMJY(FM), channel 285A, Newport, Washington, and Upper Columbia Media Association, licensee of KEEH-FM, channel 284A, Spokane, Washington; in support of a counterproposal to a Petition for Rulemaking filed by Barbara J. Geesman, licensee of Station KBBY(FM), channel 285A, Eatonville, Washington. Geesman proposes amendment of §73.202(b) of the Table of Allotments to substitute channel 285C3 for channel 285A for use by KBBY at Eatonville. The proposed KBBY upgrade would require the substitution of channel 262C2 for channel 285C2 at Wenatchee, Washington, and consequent modification of KKRv(FM)'s license; and the substitution of channel 285C1 for channel 262C1 at Moses Lake, Washington, and consequent modification of KWIQ-FM's license.

In response to the Commission's Order to Show Cause Pioneer Broadcasting Company, Inc., licensee of KWIQ(FM), Moses Lake, James and Helen Stargel, licensee of KMJY(FM), Newport, and Upper Columbia Media Association, licensee of KEEH, Spokane, will show that the modifications proposed by Geesman do not represent the most efficient use of the spectrum and that the public interest would be better served by the changes requested in this counterproposal. The modifications proposed by Geesman preclude upgrades for three other stations: KWIQ-FM, channel 262C1, Moses Lake, Washington; KMJY(FM), channel 262C1, Newport, Washington; and KEEH-FM,

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channel 285A, Newport, Washington. The licensees of these three stations therefore counterpropose the following amendments to §73.202(b) of the Table of Allotments:

<u>City</u>	<u>Channel No.</u>	
	<u>Present</u>	<u>Proposed</u>
Moses Lake, Washington	262C1	262C
Newport, Washington	285A	283C3
Spokane, Washington	284A	285C2

The authorized operation of KKRv-FM on channel 285C2, assigned to Wenatchee, Washington, would not be altered by this counterproposal. Implementation of this counterproposal would eliminate existing short-spacings between KMJY and the Bonnington Falls, B.C., Canada allotment on channel 285A; and between KMJY and KEEH, Spokane, Washington. The existing short-spacing between KMJY and the Cranbrook, B.C., Canada allotment would continue but KMJY operation with full class C3 facilities would be allowed per the *WORKING ARRANGEMENT*. The existing short-spacing between KEEH and the Cranbrook, B.C., Canada allotment would be eliminated.

The proposed changes are examined herein in detail:

(1) Moses Lake, Washington:

The attached channel study demonstrates that channel 262C can be assigned for use at Moses Lake, Washington by KWIQ(FM) in complete compliance with the Commission's applicable Rules and Regulations regarding the requisite spacing between co-channel and adjacent channel stations and allotments. The site used for the accompanying

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channel study is the reference site shown on the map following this section. The site is located at High Hill, 41.9 kilometers north-northwest of central Moses Lake, Washington. Operation with class C facilities from the reference site would provide 70 dBu coverage of the city of Moses Lake, assuming a standard class C 70 dBu contour distance of 67.7 kilometers.

(2) Newport, Washington:

The attached channel studies for the licensed and proposed operation of KMJY, from the KMJY licensed site as authorized in BLH-930823KG, demonstrate that allocation of channel 283C3 for use at Newport, Washington by KMJY-FM is in complete compliance with the Commission's applicable Rules and Regulations regarding the requisite *domestic* spacing (see note on channel study re: Cranbrook) between co-channel and adjacent channel stations and allotments. KMJY is currently 30.67 kilometers short-spaced to the Bonnington Falls, B.C. allotment, and 17.60 kilometers short-spaced to the Cranbrook, B.C., Canada, allotment per the minimum distance separation requirements outlined in the *WORKING ARRANGEMENT* referenced below. Implementation of this counterproposal will eliminate the existing short-spacing to the Bonnington Falls allotment. Under the terms of the *WORKING ARRANGEMENT FOR THE ALLOTMENT AND ASSIGNMENT OF FM BROADCASTING CHANNELS UNDER THE AGREEMENT BETWEEN THE GOVERNMENT OF CANADA AND THE GOVERNMENT OF THE UNITED STATES OF AMERICA RELATING TO THE FM BROADCASTING SERVICE* (as amended in 1997) the existing short-spacing to the Cranbrook, B.C. allotment would continue but KMJY operation with full class C facilities would be allowed per the

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WORKING ARRANGEMENT. The attached allocation study map demonstrates that operation by KMJY on channel 283 with maximum class C3 facilities (25 kW ERP @ 100 meters AHAAT) from its licensed site would cause no prohibited overlap on Canadian territory between the KMJY 48 dBu F(50,10) interfering contour and the Cranbrook 97 kilometer protected service contour based on maximum allowable class C parameters per paragraph 5.2.2.1 of the *WORKING ARRANGEMENT*. Continued 70 dBu coverage of the city of Newport will be provided since no change of site is proposed.

(2) Spokane, Washington:

The attached channel studies for the licensed and proposed operation of KEEH, from the KEEH licensed site as authorized in BLH-930629KB, demonstrate that allocation of channel 285C2 for use at Spokane, Washington by KEEH-FM is in complete compliance with the Commission's applicable Rules and Regulations regarding the requisite spacing between co-channel and adjacent channel stations and allotments. KEEH is currently 4.31 kilometers short-spaced to the Cranbrook, B.C., Canada allotment, and 4.37 kilometers short-spaced to KMJY(FM), channel 285A, Newport, Washington. Both short-spacings would be eliminated by the counterproposal.

In summary, implementation of the counterproposal will benefit the public interest by allowing upgrade of KWIQ-FM, channel 262C1, Moses Lake, Washington to 262C; KMJY(FM), channel 285A, Newport, Washington to 283C3; and KEEH-FM, channel 284A, Spokane, Washington to 285C2. Additionally, existing short-spacings between KMJY and the Bonnington Falls, B.C., Canada allotment on channel 285A; between KMJY and

KEEH, Spokane, Washington, and between KEEH and the Cranbrook, B.C., Canada allotment would be eliminated.

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Seattle, WA

FM SEPARATION STUDY

Job Title :KWIQ(FM) Moses Lake, WA per license Separation Buffer 100 km
 Channel 262C1 (100.3 MHz) FCC DB Date : 06/23/98
 Coordinates : 47-06-09 119-14-26

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
K208BY LIC	Moses Lake WA	BLFT920708TA	208D 89.5	.047 DA 54.0	47-05-47 119-17-17	259.3	3.68	0
TRANSLATOR FOR KGTS, COLLEGE PLACE, WA								
KSOH LIC	Wapato WA	BLFD920318KA	208C2 89.5	9.5 297.0	46-31-42 120-31-16	237.2	116.74	27
								89.74 CLEAR
KHHK LIC	Yakima WA	BLH960410KA	259C3 99.7	7.6 178.0	46-31-53 120-26-58	235.8	112.00	76
								36.00 CLEAR
KXLYFM LIC	Spokane WA	BLH901129KA	260C 99.9	37. 914.0	47-55-18 117-06-48	59.5	184.32	105
								79.32 CLEAR
K261CG LIC	Pasco WA	BLFT930913TC	261D 100.1	.011 DA 518.0	46-06-23 119-07-50	175.6	111.06	0
TRANSLATOR FOR KDNA, YAKIMA, WA- Vertical Polarization Only								
K261BS LIC	Milton-Freewater OR	BLFT851224TC	261D 100.1	.044 DA 170.0	45-55-24 118-22-18	152.8	147.07	0
TRANSLATOR FOR KUMA, PENDLETON, OR.								
K261BH LIC	Heppner OR	BLFT850226TC	261D 100.1	.048 345.0	45-23-28 119-30-15	186.2	191.32	0
TRANSLATOR FOR KUMA, PENDLETON, OR.								
KWIQFM PDEL	Moses Lake WA	RM9269	262C1 100.3		47-06-09 119-14-26	.0	.00	245
								-245.00 SHORT
KWIQFM LIC	Moses Lake WA	BLH830627AB	262C1 100.3	100. 59.0	47-06-09 119-14-26	.0	.00	245
								-245.00 SHORT
KKRV PADD	Wenatchee WA	RM9269	262C2 100.3		47-28-44 120-12-49	300.1	84.68	224
								-139.32 SHORT
Proposed as Class B to Canada 980615								
K262AF LIC	Suncrest, etc. WA	BLFT961125TE	262D 100.3	.006 DA 194.0	47-47-30 117-36-49	57.3	144.67	0
TRANSLATOR FOR KXLYFM, SPOKANE, WA.								
K262AG LIC	Spokane, etc. WA	BLFT980323TD	262D 100.3	.003 DA 267.0	47-37-43 117-18-48	67.3	156.90	0
Translator for KXLY, Spokane, WA								

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Seattle, WA

FM SEPARATION STUDY

Job Title :KWIQ(FM) Moses Lake, WA per license Separation Buffer 100 km
FCC DB Date : 06/23/98
Channel 262C1 (100.3 MHz) Coordinates : 47-06-09 119-14-26

Call Status	City State	FCC File No.	Channel Freq.	ERP(kw) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
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PADD	Troy ID	RM9070	262A 100.3	.0	46-44-49 116-39-59	100.5	200.01 .01	200 CLOSE
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Canadian Concurrence Required
Site Restriction 7.7km East-Alternate Consideration

CBRMFM	Creston BC		262B 100.3	.057 602.0	49-09-56 116-40-39	38.7	298.36 27.36	271 CLEAR
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KKRZ LIC	Portland OR	BLH870206KB	262C 100.3	100. 437.0	45-31-22 122-45-07	238.2	322.48 52.48	270 CLEAR
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NEW	Victoria BC		262C 100.3	100. DA 494.0	48-35-41 123-32-37	298.9	362.29 60.29	302 CLEAR
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SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION-ACCEPTED BY COMMISSION 950405

KQFM PADD	Hermiston OR	RM9205	263A 100.5	.0	45-51-57 119-18-45	182.3	137.59 4.59	133 CLOSE
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Alternate Channel

KHSS CP	Walla Walla WA	BPH960828IE	264C3 100.7	1.3 419.0	45-59-04 118-10-08	146.2	149.02 73.02	76 CLEAR
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K265BD LIC	Wenatchee WA	BLFT850808TB	265D 100.9	.055 DA 394.0	47-22-52 120-17-16	291.8	85.14 .00	0 TRANS
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TRANSLATOR FOR KYSN, EAST WENATCHEE, WA

KARYFM CPM	Grandview WA	BMPH960514IA	265C2 100.9	6.9 387.0	46-29-12 120-00-12	220.6	89.89 10.89	79 CLOSE
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One-Step Application from Channel 265C3
Proposed as Class B to Canada 960904-Accepted by Canada 961127

K265AX LIC	Chelan, etc. WA	BLFT860808TE	265D 100.9	.070 914.0	47-48-26 120-01-58	323.1	98.54 .00	0 TRANS
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TRANSLATOR FOR KOZI, CHELAN, WA.

K265BB LIC	Ellensburg WA	BLFT821026IO	265D 100.9	.036 DA 28.0	46-57-39 120-35-07	261.7	103.43 .00	0 TRANS
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Translator for KWWW, Quincy, WA.

KARYFM LIC	Grandview WA	BMLH910207KA	265A 100.9	6.0 -28.0	46-14-03 119-48-49	204.6	106.03 31.03	75 CLEAR
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*To channel 265C3 Per One-Step Application 950627IF-*To Channel 265C2 per
One-Step Application 960514IA
Proposed as Class B to Canada 960904

Hatfield & Dawson, Inc.

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Seattle, WA

FM SEPARATION STUDY

Job Title :KWIQ(FM) Moses Lake, WA per license Separation Buffer 100 km
FCC DB Date : 06/23/98
Channel 262C1 (100.3 MHz) Coordinates : 47-06-09 119-14-26

Call	City	Channel	ERP(kW)	Latitude	Bearing	Dist.	Req.
Status	State	FCC File No.	Freq.	HAAT(m)	Longitude	deg-Tru	(km) (km)

KHSS	Walla Walla	265A	3.00	46-04-04	148.8	134.19	75
LIC	WA	BLH861126KF	100.9	-4.0	118-20-21	59.19	CLEAR
*TO channel 264C2 per D87-90. *To Channel 264C3 per CP BPH-880726MN.							

** End of separation study for channel 262C1 **

Seattle, WA

FM SEPARATION STUDY

Job Title :KWIQ(FM) Moses Lake, Washington on 262C Separation Buffer 100 km
 Channel 262C (100.3 MHz) FCC DB Date : 06/23/98
 Coordinates : 47-29-20 119-26-45

Call Status	City State	FCC File No.	Channel Freq.	ERP(kw) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
K208BY LIC	Moses Lake WA	BLFT920708TA	208D 89.5	.047 DA 54.0	47-05-47 119-17-17	164.7	45.25 .00	0 TRANS
TRANSLATOR FOR KGTS, COLLEGE PLACE, WA.								
KSOH LIC	Wapato WA	BLED920318KA	208C2 89.5	9.5 297.0	46-31-42 120-31-16	217.7	134.51 99.51	35 CLEAR
KHHK LIC	Yakima WA	BLH960410KA	259C3 99.7	7.6 178.0	46-31-53 120-26-58	215.9	130.99 34.99	96 CLEAR
KXLYFM LIC	Spokane WA	BLH901129KA	260C 99.9	37. 914.0	47-55-18 117-06-48	73.7	181.56 76.56	105 CLEAR
CJMG2FM	Oliver BC		260B 99.9	.180 DA 921.0	49-08-08 119-40-08	354.9	183.86 58.86	125 CLEAR
Specially negotiated short-spaced allotment ltd. to .285kw ERP & 1103m HAAT or the equivalent along the 125 degree azimuth towards channel 260C* in Spokane, WA & ltd. to 2.4kw ERP & 708m HAAT or the equivalent along the 226.5 degree azimuth towards channel 260C* in Seattle, WA								
KISW LIC	Seattle WA	BLH850916KK	260C 99.9	100. 350.0	47-32-41 122-06-28	272.8	200.60 95.60	105 CLEAR
SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION								
K261CG LIC	Pasco WA	BLFT930913TC	261D 100.1	.011 DA 518.0	46-06-23 119-07-50	171.0	155.57 .00	0 TRANS
TRANSLATOR FOR KDNA, YAKIMA, WA- Vertical Polarization Only								
K261BS LIC	Milton-Freewater OR	BLFT851224TC	261D 100.1	.044 DA 170.0	45-55-24 118-22-18	154.4	192.46 .00	0 TRANS
TRANSLATOR FOR KUMA, PENDLETON, OR.								
K261BH LIC	Heppner OR	BLFT850226TC	261D 100.1	.048 345.0	45-23-28 119-30-15	181.1	233.23 .00	0 TRANS
TRANSLATOR FOR KUMA, PENDLETON, OR.								
KWIQFM PDEL	Moses Lake WA	RM9269	262C1 100.3		47-06-09 119-14-26	160.1	45.69 -224.31	270 SHORT
KWIQFM LIC	Moses Lake WA	BLH830627AB	262C1 100.3	100. 59.0	47-06-09 119-14-26	160.1	45.69 -224.31	270 SHORT

Seattle, WA

FM SEPARATION STUDY

Job Title :KWIQ(FM) Moses Lake, Washington on 262C Separation Buffer 100 km
 FCC DB Date : 06/23/98
 Channel 262C (100.3 MHz) Coordinates : 47-29-20 119-26-45

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
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KKRV	Wenatchee		262C2		47-28-44	269.2	57.89	249
PADD	WA	RM9269	100.3	.0	120-12-49		-191.11	SHORT
Proposed as Class B to Canada 980615								

K262AF	Suncrest, etc.		262D	.006 DA	47-47-30	75.5	141.75	0
LIC	WA	BLFT961125TE	100.3	194.0	117-36-49		.00	TRANS
TRANSLATOR FOR KXLYFM, SPOKANE, WA.								

K262AG	Spokane, etc.		262D	.003 DA	47-37-43	83.7	161.26	0
LIC	WA	BLFT980323TD	100.3	267.0	117-18-48		.00	TRANS
Translator for KXLY, Spokane, WA								

	Troy		262A		46-44-49	110.4	226.49	226
PADD	ID	RM9070	100.3	.0	116-39-59		.49	CLOSE
Canadian Concurrence Required								
Site Restriction 7.7km East-Alternate Consideration								

CBRMFM	Creston		262B	.057	49-09-56	46.6	277.31	274
	BC		100.3	602.0	116-40-39		3.31	CLOSE

NEW	Victoria		262C	100. DA	48-35-41	293.5	329.37	306
	BC		100.3	494.0	123-32-37		23.37	CLEAR
SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION-ACCEPTED BY COMMISSION 950405								

KKRZ	Portland		262C	100.	45-31-22	230.4	334.91	290
LIC	OR	BLH870206KB	100.3	437.0	122-45-07		44.91	CLEAR

KQFM	Hermiston		263A		45-51-57	176.7	180.72	165
PADD	OR	RM9205	100.5	.0	119-18-45		15.72	CLOSE
Alternate Channel								

	Hope		263A		49-23-17	326.2	256.71	182
	BC		100.5	.0	121-25-06		74.71	CLEAR

KIROFM	Seattle		264C	58.0 DA	47-30-14	271.4	190.57	105
LIC	WA	BLH970311KA	100.7	714.0	121-58-29		85.57	CLEAR
Proposed to Canada 950519-Specially Negotiated Short-Spaced Assignment								
Limited to 84kw ERP and 600m HAAT or the Equivalent along 34.4 deg azimuth								
towards channel 264C in Penticton, BC.-Accepted by Canada 950718								

KHSS	Walla Walla		264C3	1.3	45-59-04	149.3	193.65	96
CP	WA	BPH960828IE	100.7	419.0	118-10-08		97.65	CLEAR

Note:

* Counterproposal would eliminate substitution

Hatfield & Dawson, Inc.

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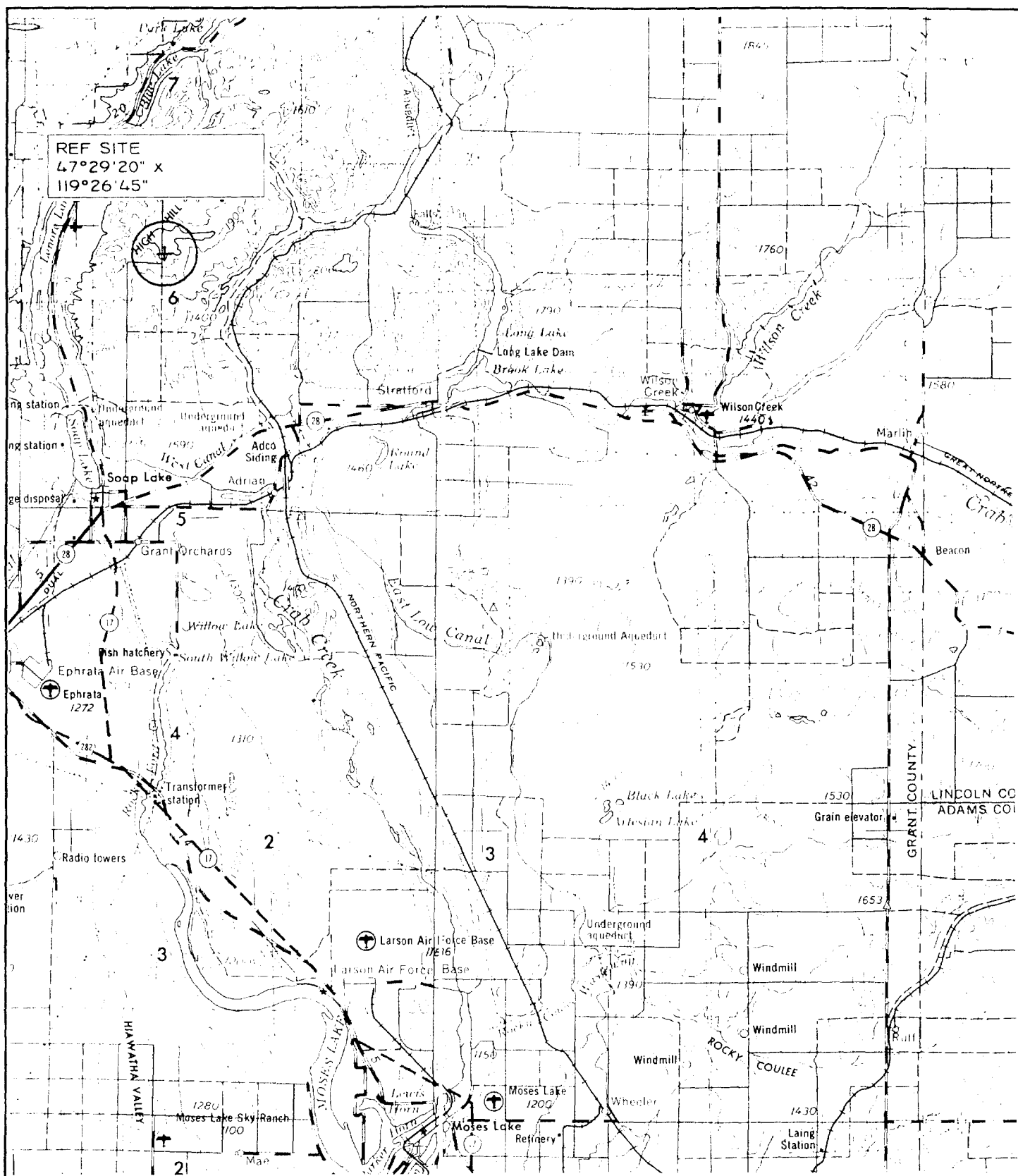
Seattle, WA

FM SEPARATION STUDY

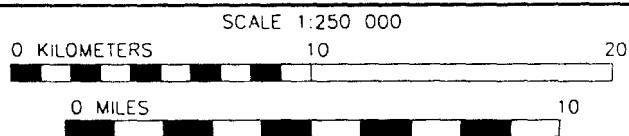
Job Title :KWIQ(FM) Moses Lake, Washington on 262C Separation Buffer 100 km
FCC DB Date : 06/23/98
Channel 262C (100.3 MHz) Coordinates : 47-29-20 119-26-45

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
CIGVFM	Penticton BC		264C 100.7	10.5 756.0	49-42-46 119-36-26	357.3	247.59 94.59	153 CLEAR
K265AX LIC	Chelan, etc. WA	BLFT860808TE	265D 100.9	.070 914.0	47-48-26 120-01-58	309.1	56.56 .00	0 TRANS
TRANSLATOR FOR KOZI, CHELAN, WA.								
K265BD LIC	Wenatchee WA	BLFT850808TB	265D 100.9	.055 394.0	DA 47-22-52 120-17-16	259.6	64.65 .00	0 TRANS
TRANSLATOR FOR KYSN, EAST WENATCHEE, WA								
K265BB LIC	Ellensburg WA	BLFT821026IO	265D 100.9	.036 28.0	DA 46-57-39 120-35-07	236.1	104.39 .00	0 TRANS
Translator for KWWW, Quincy, WA.								
KARYFM CPM	Grandview WA	BMPH960514IA	265C2 100.9	6.9 387.0	46-29-12 120-00-12	201.0	119.23 14.23	105 CLOSE
One-Step Application from Channel 265C3 Proposed as Class B to Canada 960904-Accepted by Canada 961127								
KARYFM LIC	Grandview WA	BMLH910207KA	265A 100.9	6.0 -28.0	46-14-03 119-48-49	191.5	142.29 47.29	95 CLEAR
*To channel 265C3 Per One-Step Application 950627IF-*To Channel 265C2 per One-Step Application 960514IA Proposed as Class B to Canada 960904								
KHSS LIC	Walla Walla WA	BLH861126KF	265A 100.9	3.00 -4.0	46-04-04 118-20-21	151.5	179.18 84.18	95 CLEAR
*TO channel 264C2 per D87-90. *To Channel 264C3 per CP BPH-880726MN.								

** End of separation study for channel 262C **



RITZVILLE
USGS TOPOGRAPHICAL MAP
1:250 000



HATFIELD & DAWSON
CONSULTING ENGINEERS

REFERENCE SITE FOR CLASS C UPGRADE
KWIQ(FM) MOSES LAKE, WA
PIONEER BROADCASTING

6/98

Seattle, WA

FM SEPARATION STUDY

Job Title :KMJY(FM) Newport, Washington per license Separation Buffer 100 km
 Channel 285A (104.9 MHz) FCC DB Date : 06/23/98
 Coordinates : 48-09-37 117-01-49

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
	Salmo BC		231A 94.1	.0	49-11-50 117-17-04	350.9	116.83 106.83	10 CLEAR
NEW-T APP	Bonniers Ferry ID	BPFT971022TG	232D 94.3	.005 1256.0	48-36-37 116-15-24	48.5	76.09 .00	0 TRANS
Translator for KMBI, Spokane, WA.- Horizontal Polarization Only								
KHTR LIC	Pullman WA	BLH870112KB	282C1 104.3	24.0 509.0	46-48-40 116-54-55	176.7	150.26 75.26	75 CLEAR
KEEH LIC	Spokane WA	BLH930629KB	284A 104.7	0.32 420.0	47-34-45 117-17-48	197.2	67.63 -4.37	72 SHORT
Proposed as B1 to Canada on 920306-Accepted by Canada 920602-Specially negotiated short spaced allotment.								
NEW	Cranbrook BC		284C 104.7	1.26 1048.0	49-27-34 115-37-44	34.9	177.40 -4.60	182 SHORT
Specially negotiated, short-spaced allotment								
	Cranbrook BC		284C 104.7	.0	49-27-34 115-37-44	34.9	177.40 -4.60	182 SHORT
Specially negotiated, short-spaced allotment-Accepted by Commission 940902								
CHIMFM	Kelowna BC		284C 104.7	36.0 115.0	49-46-06 119-29-59	315.7	254.32 72.32	182 CLEAR
KMJYFM	Newport WA	BLH930823KG	285A 104.9	6.0 -12.0	48-09-37 117-01-49	.0	.00 -115.00	115 SHORT
Specially-negotiated channel ltd. 6.9 kw ERP at 100m HAAT towards Bonnington Falls, BC on channel 285A (azimuth 347 degrees true north)-Accepted by Canada 921013 921013								
K285DX	Coeur d'Alene ID	BLFT880830TB	285D 104.9	.050 663.0	47-39-42 116-57-05	173.9	55.76 .00	0 TRANS
TRANSLATOR FOR KRFAFM, MOSCOW, ID-								
	Bonnington Falls BC		285A 104.9	0	49-28-00 117-30-00	346.9	149.33 -1.67	151 SHORT

Seattle, WA

FM SEPARATION STUDY

Job Title :KMJY(FM) Newport, Washington per license Separation Buffer 100 km

FCC DB Date : 06/23/98

Channel 285A (104.9 MHz)

Coordinates : 48-09-37 117-01-49

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
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K285EC	Lewiston		285D	.061 DA	46-27-29	181.6	189.33	0
LIC	ID	BLFT930623TA	104.9	617.0	117-06-01		.00	TRANS
Translator KGTS, College Place, WA								

KWIQFM	Moses Lake		285C1		47-06-09	235.4	203.54	200
PADD	WA	RM9269	104.9	.0	119-14-26		3.54	CLOSE
Proposed as Class C1 to Canada 980615								

KKRV	Wenatchee		285C2	6.1	47-28-44	253.5	250.14	166
LIC	WA	BLH910626KB	104.9	403.0	120-12-49		84.14	CLEAR
Specially negotiated short-spaced allotment.								

KKRV	Wenatchee		285C2		47-28-44	253.5	250.14	166
PDEL	WA	RM9269	104.9	.0	120-12-49		84.14	CLEAR

KVTY	Lewiston		286A	0.50	46-27-33	180.2	189.13	72
CP	ID	BPH931222MA	105.1	335.0	117-02-18		117.13	CLEAR

	Osoyoos		286B		49-06-00	300.1	214.99	137
	BC		105.1	.0	119-34-45		77.99	CLEAR

	Trail		287A		49-05-26	331.0	118.68	51
	BC		105.3	.0	117-49-08		67.68	CLEAR

	Moyie		288A		49-24-45	31.7	164.55	42
	BC		105.5	.0	115-50-15		122.55	CLEAR

** End of separation study for channel 285A **